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October 13, 2022

VIA ECF ONLY

Hon. Robert W. Lehrburger, U.S.M.J. United States District Court Southern District of New York 500 Pearl Street, Room 1320 New York, New York 10007 USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
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DATE FILED: 10/13/2022

Re: Covet & Mane, LLC v. Invisible Bead Extensions, LLC Case No. 21-cv-07740-(JPC) (RWL)

Dear Magistrate Judge Lehrburger:

We represent defendant/counterclaim plaintiff Invisible Bead Extensions, LLC ("IBE") in connection with the above-captioned matter. We write to the Court now pursuant to Your Honors' Individual Rules and Practices to request a brief extension of time, until **Wednesday, October 19, 2022**, for IBE to file its opposition to plaintiff's Covet & Mane, LLC ("C&M") motion for leave to file an amended complaint. (ECF No. 131.) C&M consents to this request.

Pursuant to Fed. R. Civ. P. 6(b)(1)(A), IBE submits good cause exists for the requested extension of time, including the undersigned's recent observance of the Jewish High Holidays which have occurred this year during weeks days, the press of other

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matters before this and other courts, as well as unexpected childcare issues that arisen in recent days.

In further compliance with §I(F) of Your Honor's Individual Practices, IBE advises the Court as follows:

- i. IBE's originally scheduled dated to file its opposition was October 12, 2022. (ECF No. 118.) C&M then filed a request for an extension of time to file its opening brief, which in turn extended IBE's time to file its opposition until October 14, 2022. (ECF No. 127.)
- ii. A request for an extension of time pertaining to the motion was previously filed by C&M and granted by the Court. (*See id.*)
- iii. C&M consents to the foregoing request, albeit, as IBE understands it, conditioned upon supplemental productions from IBE and third-parties being produced to it in the coming days. (A copy of the parties written correspondence in connection with this request dated October 12 and 13, 2022 is attached hereto as Exhibit A.)
- iv. C&M proposes that its reply memorandum be filed by **November 14, 2022** for the reasons set forth in Exhibit A.

The Court's continued attention to this matter is appreciated.

Respectfully submitted, MANDELBAUM BARRETT PC

Joel G. MacMull

cc: All Counsel of Record (via ECF only)

Request granted. Defendant opposition due Oct. 19, 2022. Plaintiff reply due Nov. 14, 2022.

SO ORDERED:

10/13/2022

HON. ROBERT W. LEHRBURGER UNITED STATES MAGISTRATE JUDGE